PETROFF AMSHEN LLP 1795 Coney Island Avenue Suite 3 Brooklyn, New York 11230 (718) 336-4200 Steven Amshen, Esq. **Hearing Date:** October 28, 2020, at 3:30 p.m. **Objections Due:** October 21, 2020, at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

In re: Chapter 13

Marie A Beaubrun, Case No.: 1-19-43044-nhl

Debtor.

## NOTICE OF MOTION SEEKING ENTRY OF AN ORDER APPROVING THE MODIFICATION OF DEBTOR'S MORTGAGE PURSUANT TO 11 U.S.C. § 105 AND FED.R.BANKR.P. 9019

PLEASE TAKE NOTICE that on October 28, 2020, at 3:30 P.M. a hearing will be held before the Honorable Nancy Hershey Lord, United States Bankruptcy Judge for the Eastern District of New York, at the United States Bankruptcy Court for the Eastern District of New York, 271-C Cadman Plaza East, Brooklyn, NY 11201, Courtroom 3577, upon the Debtor's Motion seeking entry of an Order authorizing the Debtor to enter into an agreement with PennyMac Loan Services, LLC, modifying the terms of the mortgage loan pertaining to the Debtor's property known as 118-31 154<sup>th</sup> Street, Jamaica, New York 11434.

PLEASE TAKE FURTHER NOTICE, that objections to the Motion, if any, must be in writing, conform with the Bankruptcy Code and Rules, state with particularity the grounds therefor and be filed with the Court, with a courtesy copy to the Chambers of the Honorable Nancy Hershey Lord, United States Bankruptcy Judge, and served upon, so as to be received by, Petroff Amshen LLP, the attorneys for the Debtor, Attn: Steven Amshen, Esq., no later than October 21, 2020, at 4:00 P.M. as follows: (a) (i) through the Bankruptcy Court's electronic filing system, which may be accessed through the internet at the Bankruptcy Court's website at www.nyeb.uscourts.gov;

and (ii) in portable document format (PDF) using Adobe Exchange Software for conversion; or

(b) if a party is unavailable to file electronically, such party shall submit the objection in PDF

format on a diskette in an envelope with the case name, case number, type and title of document,

document number to which the objection refers and the file name on the outside of the envelope.

PLEASE TAKE FURTHER NOTICE that the hearing to consider the Motion may be

adjourned without further notice other than by announcement of such adjournment in open Court.

PLEASE TAKE FURTHER NOTICE that if no objections with respect to the Motion

are timely filed and served, the Court may decide that you do not oppose the Motion and an Order

may be entered with no further notice or opportunity to be heard offered to any party.

Dated: September 21, 2020

Brooklyn, New York

PETROFF AMSHEN LLP

By:

/s/ Steven Amshen

Steven Amshen, Esq.

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